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August 23, 2012

Zaffar Eusuff
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236-0001

**RE: COMMENTS ON PROPOSITION 84 & 1E DRAFT 2012 IRWM GUIDELINES AND
DRAFT IMPLEMENTATION ROUND 2 PSP**

Dear Mr. Eusuff:

This letter is regarding “**reduced dependence**” on the Sacramento and San Joaquin Delta water supplies” as described in the Proposition 84 and 1E Integrated Regional Water Management (IRWM) Draft 2012 Guidelines (“Guidelines”) and Draft Round 2 Implementation Proposal Solicitation Package (PSP).

Mojave Water Agency (MWA) recognizes and supports the State’s policy to “reduce dependence” or “reduce reliance” on the Delta. However, as you are probably aware, the implementation of this policy has potentially huge impacts to agencies that utilize water supplies from the Delta. The Delta Stewardship Council (DSC) has included language in their Draft Delta Plan which would require Delta water users to reduce either the net amount, or the percentage, of their water supplies from the Delta. This DSC policy is not yet final and is being opposed by many water agencies, including MWA.

While we support reducing dependence on the Delta, we ask DWR to refrain from defining the term as narrowly as the DSC has proposed. We believe there are many ways in which a region can reduce its dependence upon the Delta. Each region has unique characteristics, and therefore a particular approach to reducing dependence on the Delta that is effective for one region may not be effective or appropriate for another region.

MWA has been investing in projects to reduce its dependence on the Delta long before it became State policy. Since the late 1990’s, MWA has been storing State Water Project (SWP) water in its conjunctive use groundwater storage projects when surplus SWP supplies are available, for use during times when SWP water is unavailable or available at reduced amounts.

At this time, we have enough groundwater storage to sustain water uses within MWA through more than a 3-year complete outage on the SWP. Additionally, we have implemented an aggressive conservation program that has resulted in a regional reduction in per-capita water use which has already exceeded "20 x 2020" requirements. We believe that these management actions have and will continue to significantly reduce our dependence on the Delta, although it does not necessarily mean we will take less water from the Delta on average over the long-term.

Furthermore, MWA has invested in the purchase of SWP Table A supplies in excess of our current demands as part of a comprehensive portfolio of water management actions identified in our IRWMP. These supplies were purchased to meet future water demands 20+ years out as required for the Urban Water Management Planning (UWMP) component of the IRWMP. A narrow interpretation of "reduced dependence," such as what has been proposed by the DSC, would penalize MWA for its forward-looking investments in water supply and potentially prevent us from making full utilization of the water supplies available to us through our SWP contract. Some other SWP contractors would be put in a similar position.

As DWR implements the new guidelines and reviews IRWM grant applications in the future, we ask that the Department remain flexible in its definition of "reduced dependence" so that agencies such as MWA can receive credit for their own regionally-appropriate investments toward reduced dependence on the Delta.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to be "Kirby Brill", written over a horizontal line.

Kirby Brill
General Manager